

SUPREME COURT OF FLORIDA

CITY OF TALLAHASSEE,
FLORIDA, et al.,

Petitioner

Case No.:
SC21-651

v.

Lower Tribunal No(s):
D20-2193;
37 2020 CA 001011

FLORIDA POLICE
BENEVOLENT ASSOCIATION,
INC., et al.,

Respondents

/

**VERIFIED MOTION FOR ADMISSION TO APPEAR PRO HAC VICE
PURSUANT TO FLORIDA RULE OF GENERAL PRACTICE AND JUDICIAL
ADMINISTRATION 2.510**

Comes now David T. Goldberg ("Movant") and respectfully represents the following:

1. Movant resides in Brooklyn, New York. Movant is not a resident of the State of Florida.
2. Movant is an attorney and a member of the following law firm with offices at the following:

Donahue, Goldberg & Littleton
240 Kent Avenue
Brooklyn, NY 11249
T. 212.334.8813
david@donahuegoldberg.com

3. Movant has been retained personally or as a member of the above-named law firm on January 29, 2022, by the American Civil Liberties Union of Florida, Inc., to provide legal representation in connection with the above-styled matter now pending before the above-named court of the State of Florida.

RECEIVED, 03/16/2022 08:44:22 AM, Clerk, Supreme Court

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdiction(s):

<u>Jurisdiction</u>	<u>Attorney/Bar Number</u>
New York State	DG0292
District of Columbia	446248

5. A judicial officer or the entity responsible for attorney regulation has neither initiated disciplinary, suspension, disbarment or contempt proceedings or disciplined, suspended, disbarred or held Movant in contempt in the preceding 5 years.

6. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

7. Movant is not an inactive member of The Florida Bar.

8. Movant is not now a member of The Florida Bar.

9. Movant is not a suspended member of The Florida Bar.

10. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation or disciplinary revocation from The Florida Bar.

11. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of General Practice and Judicial Administration 2.510.

12. Movant has filed motion(s) to appear as counsel in Florida state courts during the past five (5) years in the following matters: **None**.

13. Local counsel of record associated with Movant in this matter is Benjamin Stevenson (Fla. Bar No. 598909) who is an active member in good standing of The Florida Bar and has offices at the following:

American Civil Liberties Union Foundation of Florida, Inc.
3 W. Garden St., Suite 712
Pensacola, FL 32502-5636
T. 786.363.2738

14. Movant has read the applicable provisions of Florida Rule of General Practice and Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

15. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

Dated: March 11, 2022

David T. Goldberg
Donahue, Goldberg & Littleton
240 Kent Avenue
Brooklyn, NY 11249
T. 212.334.8813
david@donahuegoldberg.com

STATE OF NEW YORK
COUNTY OF KINGS

I, David T. Goldberg, do hereby swear under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.

s/David T. Goldberg
David T. Goldberg

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

Dated: March 16, 2022

s/Benjamin James Stevenson
Benjamin James Stevenson
Fla. Bar. No. 598909
ACLU Found. of Fla.
3 W. Garden St., Suite 712
Pensacola, FL 32502-5636
T. 786.363.2738
bstevenson@aclufl.org

Counsel for the Amicus Curiae ACLU of Fla.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been furnished to all persons included in case's service list on the E-filed date of this document by filing the document with service through the e-Service system (Fla.R.Jud.Admin. 2.516(b)(1)), and that the movant has paid the fees described in the Rules Regulating The Florida Bar concerning non-Florida lawyer appearances in a Florida court or has notified The Florida Bar of movant's request for a judicial waiver of said fees.

s/Benjamin James Stevenson
Benjamin James Stevenson